



## Tribal Concerns Heard to Date on Potential AZ Assumption of 404...

- Lack of support for ADEQ assuming 404 program
- Impact of 22 sovereign nations vs State of Arizona
- Need for government-to-government consultation prior to EPA consideration of Arizona's request
- Loss of federal nexus and federal trust responsibilities
- Limits application of Executive Order 13715
- Reduced protections under 106 of NHPA, NEPA & ESA
- Lack of comparable state laws – state commitment to minimize impacts to cultural resources and waters
- Potential impacts to tribal waters from upstream projects